

# **EXHIBIT E**

# Estate of Patrick Finegan

# VCF Documentation



September 11th  
Victim Compensation Fund

August 6, 2018

GLORIA FINEGAN  
79-09 68TH ROAD  
MIDDLE VILLAGE NY 11379

Dear GLORIA FINEGAN:

The September 11th Victim Compensation Fund ("VCF") has reviewed your Eligibility Form. You submitted an Eligibility Form on behalf of PATRICK FINEGAN. Your claim number is VCF0100581. Your Eligibility Form was determined to be substantially complete on August 03, 2018. As stated in the Regulations and on the claim form, by filing a substantially complete Eligibility Form, you have waived your right to file or be a party to a September 11th-related lawsuit on behalf of the decedent and his or her survivors.

#### **The Decision on your Claim**

The VCF has determined that the decedent has met the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, the decedent has been found eligible for the following injuries:

- ACUTE MYELOID LEUKEMIA
- BASAL CELL CARCINOMA OF SKIN, UNSPECIFIED
- UNSPECIFIED SINUSITIS

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or the amount of your award.

#### **What Happens Next**

**If the decedent was certified for treatment by the WTC Health Program for a condition not listed above**, you should amend your claim. Please see the VCF website for details on how to amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

**If you believe the decedent had eligible injuries not treated by the WTC Health Program** and you would like the VCF to consider those injuries before calculating the amount of any



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compensation, you should amend your claim. If you choose to amend your claim, you will need to use the VCF Private Physician process. The Private Physician process is a way for the VCF to gather the required information about the decedent's treatment in order to process your claim. All forms are available on the VCF website under "Forms and Resources." The website also includes detailed information and instructions on the Private Physician process.

**If the decedent did not have injuries other than those listed above,** you should submit your Compensation Form and required supporting materials. If you have already submitted your Compensation Form, you do not need to take any action at this time unless you receive a request from the VCF for missing information. The VCF will calculate the amount of any compensation based on the conditions listed above after all compensation-related documents are submitted.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya  
Special Master  
September 11th Victim Compensation Fund

cc: WENDELL TONG



September 11th  
Victim Compensation Fund

May 13, 2020

GLORIA FINEGAN  
79-03 68TH ROAD  
MIDDLE VILLAGE NY 11379

Dear GLORIA FINEGAN:

The September 11th Victim Compensation Fund ("VCF") sent you a letter on August 15, 2019 notifying you of the decision on your claim and the amount of your award. Your claim number is VCF0100581. That letter included a request for documents that were missing from your claim and are required in order to process your payment. The VCF has since received the requested documents and this letter provides the details of your award and information on the next steps to be taken on your claim.

After reviewing the responses in your claim form, the documents you submitted in support of your claim, and information from third-party entities, the VCF has calculated the amount of your award as **\$654,734.18**. This determination is in accordance with the requirements of the Never Forget the Heroes: James Zadroga, Ray Pfeifer, and Luis Alvarez Permanent Authorization of the September 11th Victim Compensation Fund Act ("VCF Permanent Authorization Act"). The enclosed "Award Detail" includes a detailed explanation of the calculation and a list of the eligible conditions that were considered when calculating your award.

The VCF has determined that the loss of your husband's FDNY pension benefits, which terminated at his death, is not a loss compensable by the VCF. That said, the Special Master recognizes the fairness disparity in a process whereby former first responders, such as your husband, who responded to the WTC site in the wake of the attacks, do not qualify for Line of Duty death designations from their former employers because they were not officially deployed to the response effort. Based on the circumstances presented in your claim, and in the discretion of the Special Master, your compensation award includes \$250,000.00 in economic loss.

No non-routine legal service expenses are approved for reimbursement for this claim.

### **What Happens Next**

The VCF will deem this award to be final and will begin processing the full payment on your claim unless you complete and return the enclosed Compensation Appeal Request Form within **30 days from the date of this letter** as explained below. If you do not appeal, the Special Master will authorize the payment on your claim within 20 days of the end of the 30-day appeal period. Once the Special Master has authorized the payment, it may take up to three weeks for the United States Treasury to disburse the money into the bank account designated on the VCF ACH Payment Information Form or other payment authorization document you submitted to the VCF.



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- **Appealing the Award:** You may request a hearing before the Special Master or her designee if you believe the amount of your award was erroneously calculated, or if you believe you can demonstrate extraordinary circumstances indicating that the calculation does not adequately address your loss. **If you choose to appeal, your payment will not be processed until your hearing has been held and a decision has been rendered on your appeal.**

To appeal the award, you must complete two steps by the required deadlines:

1. Complete and return the enclosed **Compensation Appeal Request Form** within **30 days from the date of this letter**. Follow the instructions on the form and upload it to your claim or mail it to the VCF by the required deadline. If you do not submit your completed Compensation Appeal Request Form within 30 days of the date of this letter, *you will have waived your right to an appeal* and the VCF will begin processing any payment due on your claim.
2. Complete and submit your **Compensation Appeal Package** (Pre-Hearing Questionnaire, Compensation Explanation of Appeal, and all applicable supporting documents) no later than **60 days from the date of this letter**. It is important that you carefully review the information enclosed with this letter and follow the instructions if you intend to appeal your award. Additional instructions on the appeals process can be found on the VCF website under “Frequently Asked Questions” and in the “Policies and Procedures” document.

Once your complete Compensation Appeal Package is submitted, the VCF will review the information to confirm you have a valid appeal, and will notify you of the next steps specific to your appeal and the scheduling of your hearing.

- **Notifying the VCF of new Collateral Source Payments:** You must inform the VCF of any new collateral source payments you receive, or become entitled to receive, such as a change to your disability or survivor benefits, as this may change the amount of your award. If you notify the VCF within 90 days of learning of the new collateral source payment, your award will not be adjusted to reflect the new entitlement or payment. If you notify the VCF more than 90 days after learning of the new or revised entitlement or payment, the VCF may adjust your award to reflect the new payment as an offset, which may result in a lower award. If you need to notify the VCF of a new collateral source payment, please complete the “Collateral Offset Update Form” found under “Forms and Resources” on the [www.vcf.gov](http://www.vcf.gov) website.

Your award was calculated using our published regulations, and I believe it is fair and reasonable under the requirements of the VCF Permanent Authorization Act. As always, I emphasize that no amount of money can alleviate the losses suffered on September 11, 2001.

If you have any questions, please call our toll-free Helpline at 1-855-885-1555. Please have your claim number ready when you call: **VCF0100581**. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.



September 11th  
Victim Compensation Fund

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Sincerely,

Rupa Bhattacharyya  
Special Master  
September 11th Victim Compensation Fund

cc: WENDELL TONG



September 11th  
Victim Compensation Fund

## Award Detail

Claim Number: VCF0100581  
Decedent Name: PATRICK FINEGAN

<b>PERSONAL INJURY CLAIM (Losses up to Date of Death)</b>	
<b>Lost Earnings and Benefits</b>	
Loss of Earnings including Benefits and Pension	\$0.00
Mitigating or Residual Earnings	\$0.00
<b>Total Lost Earnings and Benefits</b>	<b>\$0.00</b>
<b>Offsets Applicable to Lost Earnings and Benefits</b>	
Disability Pension	\$0.00
Social Security Disability Benefits	\$0.00
Workers Compensation Disability Benefits	\$0.00
Disability Insurance	\$0.00
Other Offsets related to Earnings	\$0.00
<b>Total Offsets Applicable to Lost Earnings</b>	<b>\$0.00</b>
<b>Total Lost Earnings and Benefits Awarded</b>	<b>\$0.00</b>
<b>Other Economic Losses</b>	
Medical Expense Loss	\$0.00
Replacement Services	\$0.00
<b>Total Other Economic Losses</b>	<b>\$0.00</b>
<b>Total Economic Loss</b>	<b>\$0.00</b>
<b>Total Non-Economic Loss</b>	<b>\$300,000.00</b>
<b>Subtotal Award for Personal Injury Claim</b>	<b>\$300,000.00</b>



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<b>DECEASED CLAIM (Losses from Date of Death)</b>	
<b>Loss of Earnings including Benefits and Pension</b>	\$250,000.00
<b>Offsets Applicable to Lost Earnings and Benefits</b>	
Survivor Pension	
SSA Survivor Benefits	
Worker's Compensation Death Benefits	
Other Offsets related to Earnings	
<b>Total Offsets Applicable to Loss of Earnings and Benefits</b>	\$0.00
<b>Total Lost Earnings and Benefits Awarded</b>	\$250,000.00
<b>Other Economic Losses</b>	
Replacement Services	\$11,381.00
Burial Costs	\$12,272.25
<b>Total Other Economic Losses</b>	\$23,653.25
<b>Total Economic Loss</b>	\$273,653.25
<b>Non-Economic Loss</b>	
Non-Economic Loss - Decedent	\$250,000.00
Non-Economic Loss - Spouse/Dependent(s)	\$100,000.00
<b>Total Non-Economic Loss</b>	\$350,000.00
<b>Additional Offsets</b>	
Social Security Death Benefits	(\$255.00)
Life Insurance	(\$187,445.47)
Other Offsets	(\$36,218.60)
<b>Total Additional Offsets</b>	(\$223,919.07)
<b>Subtotal Award for Deceased Claim</b>	\$399,734.18



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<b>Subtotal of Personal Injury and Deceased Claims</b>	\$699,734.18
PSOB Offset	\$0.00
Prior Lawsuit Settlement Offset	\$0.00
Award Paid on Prior Personal Injury Claim	(\$45,000.00)
<b>TOTAL AWARD</b>	<b>\$654,734.18</b>

#### **Factors Underlying Economic Loss Calculation**

Annual Earnings Basis (without benefits)	
Percentage of Disability attributed to Eligible Conditions - applicable to Personal Injury losses	
Start Date of Loss of Earnings Due to Disability - applicable to Personal Injury losses	

#### **Eligible Conditions Considered in Award**

Acute Myeloid Leukemia
Basal Cell Carcinoma of Skin, Unspecified
Unspecified Sinusitis

# Family Member Affidavits

Edward J. Finegan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

JILL ACCARDI, et al.,

**AFFIDAVIT OF  
EDWARD J. FINEGAN**

----- X

Plaintiffs,

21-CV-06247 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK )  
                       : SS  
COUNTY OF QUEENS   )

Edward J. Finegan, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 79-03 68<sup>th</sup> Road, Middle Village, NY 11379.

2. I am currently 34 years old, having been born on January 26, 1989.

3. I am the son of Decedent, Patrick Finegan, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

4. My father passed away from Leukemia on November 7, 2014, at the age of 65. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My father Patrick Finegan was a firefighter for the FDNY. He had to retire from the job earlier than he would've liked but selfishly, for me, it was great because for the majority of my childhood I always had my father around. He never lost his love for the FDNY, he still attended as many events as he could, and I was lucky enough to tag along for many of them. His love of the job and the bond he had with his fellow firefighters rubbed off on me and because of him I now have my dream job as a firefighter for the FDNY. Between playing hockey, baseball, and basketball I can probably count on one hand how many games or practices my dad may have missed. We spent countless hours in the car together traveling all around for my travel hockey practices and games. Our discussions during these rides touched on all facets of life. This is a time I probably took for granted then but will cherish forever. My father was a jack of all trades. We lived in an older house, always had used cars and went through a couple of older boats through the years, so there were always projects to be done and repairs to be made. Me being the youngest of three by a few years, more often than not I was around to be his right-hand man for most of these. I learned so much from him during these situations. His ability to remain calm and take things as they come and come up with a plan to mitigate the situation always amazed me and sticks with me to this day. His methods weren't always conventional, which is why he was called MacGyver by some. This never held truer than on one of our annual summer trips to Lake George. My father had bought a used boat one summer and for the next couple of years in lieu of driving, we would take the boat up the Hudson River from College Point, NY, to Lake George, NY. I was a young teen at the time, and at about the halfway point on one of the trips we had engine trouble, one of the motor mounts failed on our inboard engine. The boat would certainly have to be taken out of the water and brought to a mechanic, or so I thought. My father came up with a plan to fix it and he couldn't do it without my help, I wanted nothing to do with it, I didn't think it would work and I was concerned things would get worse. He always had a calmness in his voice when most others would be frantic. It was impossible to not feel more comfortable, he told me to trust him, and I did. Moments later the motor mount was secured and off we were to our destination.

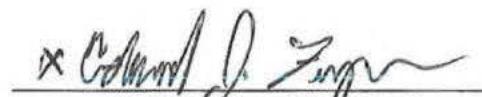
That would be the last time I ever doubted him. From then, till now and for the rest of my life, in any situation I find myself in I will take a step back and think, "What would Dad do?"

6. I was in 6th grade on September 11, 2001. I remember getting picked up from school early by my mother and going home where my father was watching the events unfold. I didn't realize how severe the situation was until I saw my dad, I've never seen him so distraught. Although he was retired from the FDNY at the time he couldn't sit home knowing how many firefighters and civilians had just lost their lives or were trapped in the collapses. He instantly started looking for ways to help and he became part of the FDNY's Disaster Assistance Response Team (DART). He was given a van which he would drive down to Ground Zero every day and transport firemen, families, and supplies to and from the site every day. At the end of each day, he would clean the van he was given, obviously not knowing at the time how harmful the air he had been breathing and the debris and dust he was cleaning out was.

7. My father's illness started with something as simple as a mark on his chest that we thought nothing of. When he went to get it checked out it led to him being diagnosed with a rare form of leukemia. After his diagnosis he was admitted into Memorial Sloan Kettering hospital for inpatient cancer treatments. The last couple of months of my father's life were spent in that hospital. Because of the treatments he was receiving his immune system was weakened, therefore he wasn't taking many visitors. I know it was extremely hard for him to turn away his family and friends, and hard for us to stay away, but he was set on beating cancer and didn't want to have anything possibly have a negative effect on his recovery and treatments. My father was always positive about what was happening, he was the strongest person I've ever known but being in that hospital away from all of us was extremely hard for everyone.

8. We all thought my father was going to beat this disease, I never doubted it. Maybe it was just me being ignorant but his positive outlook on things, and knowing how strong and

determined he was, gave me hope. He came home from the hospital for one night, we thought we were through the worst of it, only to have to rush him back to the hospital as his health rapidly declined and before we knew it he was gone. With what felt like blink of an eye my father, my hero and my best friend were gone. I couldn't believe it and to this day I still go back to my last moments with him. All the emotions come rushing back and it feels like it was just yesterday. Since his passing I've had many big moments in my life that made him not being there even harder. One month after he passed, I received my letter from the FDNY saying I was hired as a firefighter and started the academy shortly after. I always looked forward to sharing this moment with him and unfortunately, I never got the chance. I've since married my wife and we had our beautiful baby girl. The fact that neither my wife nor daughter had the chance to meet him hurts me to my core. I often talk about him with them, sharing stories, memories, and photos of him, but they will never do him justice. He was larger than life. Everyone who ever knew him is a better person for it and we all miss him deeply. Since the day my father left us, I haven't gone more than a few hours without thinking about him and I never will.

  
EDWARD J. FINEGAN

Sworn before me this

6 day of Sept 2023

Notary public

Hong Tae Joon  
Notary Public, State of New York  
Qualified in New York County  
Reg No 01HO6103878  
My Commission Expires 11/12/24

Gloria Finegan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

JILL ACCARDI, et al.,

**AFFIDAVIT OF  
GLORIA FINEGAN**

----- X

Plaintiffs,

21-CV-06247 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK        )  
                               :  
COUNTY OF QUEENS        )

Gloria Finegan, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 79-03 68<sup>th</sup> Road, Middle Village, NY 11379.

2. I am currently 67 years old, having been born on March 16, 1956.

3. I am the wife of Decedent, Patrick Finegan, upon whose death my claims are based. I submit this Affidavit in support of the present motion for a default money judgment for the claim made on behalf of my husband's estate and for my solatium claim. On August 15, 2016, I was issued Letters of Administration as Administrator of my husband's estate by the Queens County Surrogate's Court.

4. My husband passed away from Leukemia on November 7, 2014, at the age of 65. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My husband, Pat Finegan, was a member of the FDNY. We were married for 35 years as of September 22, 2014. I had known Pat, all in all, for 40 years. I have many beautiful memories shared with my husband. Starting from our honeymoon in Bermuda to our summers spent in Lake George. The year Pad died was our 29<sup>th</sup> year spent at the lake. My Children, grandchildren, and I still go. He always loved the lake, because he was able to get away from everything in the city and just truly relax with family and friends. Through him I learned to just take each day as it comes and enjoy it. Being with family and friends are the most important things. Savor each moment. Be tough, strong and resilient, kind and loving. Pat was all that and more. He was everything.

6. September 11, 2001 was very upsetting and emotional for all of us. I remember when it happened, my husband had wanted to get there and do whatever he could to help. He was on the DART (Disaster Assistance Relief Team) for the FDNY and he was down at the 9/11 site everyday doing whatever needed to be done.

7. Pat's cancer seemed to have come out of nowhere. At the beginning, I remember him being extremely tired and he wasn't able to do many activities. When we went on vacation to Lake George, he slept most of the days that we were there. He couldn't even go to a special Yankee game with his daughter because he was just so tired. His life wasn't ever the same. He thought that it was his heart and that he needed a stent put in. He has had that done before. When we went to see his cardiologist at Lenox Hill Hospital, they told him his heart was perfectly fine, but his blood was extremely low. They didn't know how he was able to walk into the hospital because of how low it was. He needed a transfusion and that's when they started running all sorts of tests on him. They found out that he had a very rare blood cancer. He went to Sloan Kettering to begin his cancer treatment. He was put into Sloan Kettering on September 23, 2014 and came out as an outpatient

on November 4, 2014, but he had to be readmitted on the 5<sup>th</sup>. He passed away on November 7<sup>th</sup>. So, he really was never able to get back to the way of life he was accustomed to.

8. My life hasn't been the same since my husband died. I lost the love of my life. I miss having his arms around me and making me feel that all will be right in the world. I don't have him to talk with, confide in, or just laugh over something silly one of us said or did. I cherish all those moments shared with him. We both spoke about when we would have grandchildren and how that would be. Well, we have three grandchildren and one on the way, and he's not here to see or be a part of their lives. How he would have loved and cherished them. I tell them all about their Grandpa and show them his pictures. I myself, after 8 ½ years still miss him terribly and I'm not the happy person I once was when he was here. A huge part of me is missing and I don't think I'll ever be the same without him. I will say that my grandchildren bring me much happiness and joy, and our three children have been so good to me. They miss their father tremendously. It breaks my heart. I know he would be so proud of them. He has also missed knowing that his two sons passed the Lieutenant's test on the FDNY. That, he would've been so proud of. Even with all my children and grandchildren around me, I'm still lonely.



GLORIA FINEGAN

Sworn before me this

29 day of August, 2023

Notary Public



Kristin M. Finegan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

JILL ACCARDI, et al.,

**AFFIDAVIT OF  
KRISTIN M. FINEGAN**

Plaintiffs,

21-CV-06247 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK        )  
                                : SS  
COUNTY OF QUEENS        )

Kristin M. Finegan, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 61-18 77<sup>th</sup> Street, Middle Village, NY 11379.
2. I am currently 42 years old, having been born on October 5, 1980.
3. I am the daughter of Decedent, Patrick Finegan, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.
4. My father passed away from Leukemia on November 7, 2014, at the age of 65. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. Pat Finegan is my father. He is my absolute superhero and my pal. As a daddy's girl I turned to him for everything. He was very family oriented. He was a NYC fireman. His family and the FDNY meant so much to him. I have so many great, fun memories with my Dad. We went to Lake George every summer. He took me camping as a little girl along with my uncle and a few guys from their firehouse. It was all the kids and our dads. We went to Yankees games together as we were the only Yankee fans in my family. We spent summers on the boat. He taught me the rules of the water. He also taught me how to drive a car. This is where I also learned a few quick fixes whenever I had car and/or boat trouble. I often tagged along with him when he went to FDNY events. He brought me to my castings in the city. If I needed him, he was there, no questions asked. He was like this with everyone he cared about, especially his family.

6. 9/11 was devastating and heartbreaking for my family, especially for my father. My Dad was home on 9/11 and as the towers fell, I watched him watching the tv. He just appeared so worried and upset as he said so many guys (firemen) are trapped inside. He was retired from the FDNY at that time but that didn't stop him from being down at ground zero. From that day on he was down at the WTC. He felt he had to be. He needed to be there helping his fellow firemen. He worked with the DART team. He was given a van from the FDNY to transport firemen and families as well as supplies to and from the site. Every day he cleaned that dust out of his van when he was home. My boyfriend at the time lost his brother. He was a fireman who got trapped in the first tower. My Dad was always trying to get updates for his family. My Dad did whatever he could do to help.

7. I remember my father started to feel very tired and weak. He backed out of Derek Jeter day at Yankee stadium with me. This was not him. He never canceled on me. That's how weak he felt. He went to get an angiogram on September 11, 2014 (Ironically). It was then that

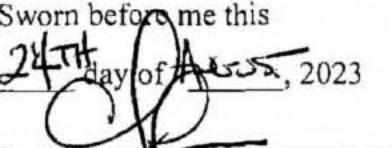
they discovered his blood levels were extremely low. The doctors couldn't believe he had even been able to get out of bed. On September 13, 2014, they found out what he had. He had a rare and aggressive blood cancer that they said he got from being down at the World Trade Center. He went from Lenox Hill Hospital to Sloan Kettering Hospital where he was an inpatient and he received aggressive chemotherapy. They had to treat the cancer aggressively because it was an aggressive cancer and he had to stay in the hospital for the rest of September and all of October. That was his quality of life. He was very optimistic though and planned on beating the cancer. I celebrated my birthday with him at Sloan Kettering. He was to start outpatient therapy in November as he was released from the hospital and his brother - my uncle - was a match for him to have a bone marrow transplant. He was looking forward to being home for thanksgiving and celebrating with his family. He came home November 4, 2014. I met him at the hospital and drove home with him. He couldn't wait to surprise my mother. The next day he fell ill and was rushed back to Sloan. He died two days later.

8. It's really hard for me to find the words to describe how losing the most important man in my life has affected me. The day my father died is the day my life changed forever. My heart is forever broken. My worst nightmare is my reality. Every single thing has been impacted. Happy experiences are now bittersweet. My dad was my guy, my support, my everything. I hung out with my Dad. We always spent time together. If I needed help, he was there for me whether it was emotional support or relationship or financial advice or to fix my car or something in my apartment. He knew how to do everything. He really helped me with everything honestly. He helped me pick out the right cars. I've had to do that on my own now. I bought a house and have had to do repairs. I know he'd be here helping or at least telling us who to call to help us. He's the only man I ever really depended on and who was there for me. I could always count on my Dad.

He never had the chance to meet my fiancé. He can't walk me down the aisle. It's actually made me put off getting married because it's too hard for me. Want to know what's worse than my Dad not being there for my wedding day? My Dad is not here to be with his two grandsons. My two boys who are my everything will never meet the most important man in my life. They are missing out on having the best Grandpa. I talk about him and show them his pictures but I would give anything for them to be able to physically spend time with my dad - their Grandpa. I just know all that he'd be doing with them. I want them to experience him the way I did and how my brothers did. My dad would have been the best Grandpa. My kids are truly missing out. I have had to watch my Mother who I love more than anything grieve and live with a broken heart. Being with her grandchildren is the first time I've seen her truly smile since my father has passed. I hate that she doesn't have him with her to experience her grandkids with. She is the best grandmother to my boys and my niece, but I know she wishes he was here with her. She is both Grammy and Grandpa. I miss my Dad. I was 34 when he passed. I still need him. I wish we could talk again and hang out. I look for that support from him and guidance. I remember all he taught me, but I know I had so much more to learn. My kids suffer too because they are missing out on having their Grandpa.



KRISTIN M. FINEGAN

Sworn before me this  
24<sup>th</sup> day of April, 2023  
  
Notary public

**CHRISTOPHER TSCHERNE**  
Notary Public, State of New York  
No. 01TS5025918  
Qualified In Queens County  
Commission Expires April 4, 2024  


Patrick J. Finegan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

JILL ACCARDI, et al.,

**AFFIDAVIT OF  
PATRICK J. FINEGAN**

Plaintiffs,

21-CV-06247 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW YORK        )  
                                : SS  
COUNTY OF QUEENS        )

Patrick J. Finegan, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 68-19 79<sup>th</sup> Street, Middle Village, NY 11379.
2. I am currently 39 years old, having been born on May 25, 1984.
3. I am the son of Decedent, Patrick Finegan, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.
4. My father passed away from Leukemia on November 7, 2014, at the age of 65. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. Decedent is my father. My dad was a retired firefighter. Seeing how 9/11 impacted his life and what his response was influenced me to become a firefighter myself. I owe everything to my father in regard to where my life is now. He raised me in a way that has allowed me to be the man I am today.

6. On September 11, 2001, my father, having been already retired from the FDNY, was home watching everything go down on television. It was a devastating day for him because he knew he just lost a ton of men that were his friends and past colleagues. From there on out he was volunteering his time every day, pitching in down at the pile any way he could. He worked with the FDNY's Disaster Assistance Response Team (DART) team and helped transport goods as well as members and their families to and from the site and wherever else they needed to be. He worked alongside active members and any other people who may have been down there doing all they could to help many of whom have also lost their lives to the never-ending effects of that day.

7. The first time I can remember noticing something odd with my father was when he picked me up from the airport in Albany and he had to pull over to puke. It's something I had never witnessed before. After getting the testing done it was eventually discovered that he had a rare blood cancer that was not very common. It was eventually recognized as a WTC cancer, and he was able to receive treatment at Sloan Kettering. He was hospitalized for a couple of months before finally coming home for one night where complications from the treatments eventually led to him passing away.

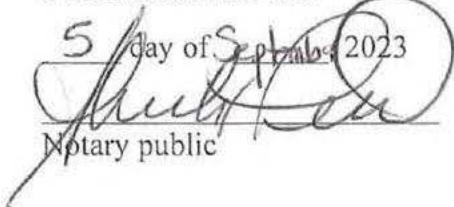
8. It's very hard to explain the effect the loss of your father can have on your life. You grow up in his shadow, follow the same career path, and work every day to make him proud. It's also extremely hard losing a father when you are as close to him as I was. It's never easy losing a

best friend and a mentor and he was definitely both of those and more.



PATRICK J. FINEGAN

Sworn before me this

5 day of September 2023  
  
Notary public

SHEILA PETTIT  
Notary Public, State of New York  
No. 01PE6065703  
Qualified in Nassau County  
Commission Expires Sept. 16, 2024